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**CR-05-0180-LRS**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DIXIE ELLEN RANDOCK,  
STEVEN KARL RANDOCK, SR.,  
RICHARD JOHN NOVAK,  
BLAKE ALAN CARLSON,  
AMY LEANN HENSLEY,  
HEIDI KAE LORHAN,  
ROBERTA LYNN MARKISHTUM, and  
KENNETH WADE PEARSON,

Defendants.

## INDICTMENT

Vio: 18 U.S.C. §§ 371, 1341  
and 1343Conspiracy To Commit  
Mail Fraud and Wire  
Fraud  
(Count 1)18 U.S.C. §§ 1956(h)  
Conspiracy to Launder  
Monetary Instruments  
(Count 2)18 U.S.C. §§ 981(a)(1)(C)  
982(a)(1) and  
28 U.S.C. § 2461(c)  
Criminal Forfeiture  
(Count 3)

The Grand Jury Charges:

GENERAL ALLEGATIONS

At all material times to this Indictment,

1. Defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR. resided at 3127 East River Glen, Colbert, Washington. They together owned and operated several internet businesses. These internet businesses, owned by defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR., used the names "St. Regis University," "Robertstown

1 University,” and “James Monroe University” and they were diploma mills in that  
2 these “universities” had no legitimate faculty members, offered no legitimate  
3 academic curriculum or services, required no course or class work, and were not  
4 recognized by the United States Department of Education.

5 2. Defendant HEIDI KAE LORHAN, resided at 14308 East 22d  
6 Avenue, Veradale (also known as Spokane Valley), Washington, and was  
7 employed by defendants DIXIE ELLEN RANDOCK and STEVEN KARL  
8 RANDOCK, SR.

9 3. Defendant AMY LEANN HENSLEY resided at 8015 East Baldwin,  
10 Spokane, Washington, and was employed by defendants DIXIE ELLEN  
11 RANDOCK and STEVEN KARL RANDOCK, SR.

12 4. Defendant ROBERTA LYNN MARKISHTUM resided in Spokane,  
13 Washington, and was employed by defendants DIXIE ELLEN RANDOCK and  
14 STEVEN KARL RANDOCK, SR.

15 5. Defendant BLAKE ALAN CARLSON resided in Spokane,  
16 Washington, and was the President of Northwest Business Stamp, Inc. in Spokane,  
17 Washington. Northwest Business Stamp, Inc. was engaged in the business of  
18 making seals, pre-inked and rubber stamps, name tags, and interior engraved  
19 signs.

20 6. Defendant RICHARD JOHN NOVAK resided in Peoria, Arizona and  
21 was employed by defendants DIXIE ELLEN RANDOCK and STEVEN KARL  
22 RANDOCK, SR.

23 7. Defendant KENNETH WADE PEARSON, resided in Spokane,  
24 Washington, and was employed by defendants DIXIE ELLEN RANDOCK and  
25 STEVEN KARL RANDOCK, SR.

26 COUNT 1

27 (Conspiracy To Commit Wire/Mail Fraud)

28 8. Paragraphs 1 through 7 of the General Allegations section of this

1 Indictment are realleged and incorporated herein by reference.

2 THE CONSPIRACY AND ITS OBJECTS

3 9. From a date unknown to the Grand Jury, but beginning at least by on  
4 or about August 4, 1999, and continuing thereafter up to and including August 11,  
5 2005, within the Eastern District of Washington and elsewhere, defendants DIXIE  
6 ELLEN RANDOCK, STEVEN KARL RANDOCK, SR., RICHARD JOHN  
7 NOVAK, BLAKE ALAN CARLSON, AMY LEANN HENSLEY, HEIDI KAE  
8 LORHAN, ROBERTA LYNN MARKISHTUM, and KENNETH WADE  
9 PEARSON did knowingly combine, conspire, confederate, agree with each other,  
10 and with others known and unknown to the Grand Jury, to commit an offense  
11 against the United States, to wit: mail fraud, in violation of Title 18, United States  
12 Code, Section 1341; and wire fraud, in violation of Title 18, United States Code,  
13 Section 1343.

14 THE SCHEME AND ARTIFICE TO DEFRAUD

15 10. At a date unknown, but beginning at least by on or about August 4,  
16 1999, and continuing thereafter up to and including August 11, 2005, in the  
17 Eastern District of Washington and elsewhere, defendants DIXIE ELLEN  
18 RANDOCK, STEVEN KARL RANDOCK, SR., RICHARD JOHN NOVAK,  
19 BLAKE ALAN CARLSON, AMY LEANN HENSLEY, HEIDI KAE LORHAN,  
20 ROBERTA LYNN MARKISHTUM, and KENNETH WADE PEARSON did  
21 knowingly and willfully devise and intend to devise a scheme and artifice to  
22 defraud and to obtain money and property by means of material false and  
23 fraudulent pretenses, representations and promises; and for the purpose of  
24 executing the scheme and artifice to defraud the defendants used, or caused others  
25 to use, the United States Postal Service, commercial interstate carriers, and wire  
26 communications in interstate and foreign commerce. The object of the scheme and  
27 artifice to defraud was to obtain money from consumers worldwide by selling  
28 those consumers fraudulent academic diplomas, degrees, and records that the

1 consumers did not earn through actual course work and that were issued by  
2 business entities that lacked any accreditation. That scheme and artifice is set  
3 forth more fully below.

4 MANNER AND MEANS OF THE CONSPIRACY

5 11. It was part of the scheme and artifice to defraud that the defendants  
6 DIXIE ELLEN RANDOCK, STEVEN KARL RANDOCK, SR., RICHARD  
7 JOHN NOVAK, BLAKE ALAN CARLSON, AMY LEANN HENSLEY, HEIDI  
8 KAE LORHAN, ROBERTA LYNN MARKISHTUM, and KENNETH WADE  
9 PEARSON, for a fee, manufactured, transmitted, and sold fraudulent academic  
10 products, including, but not limited to, fraudulent high school "diplomas" and  
11 college "degrees," fraudulent academic transcripts, and dean's lists over the  
12 internet to thousands of consumers throughout the United States, and foreign  
13 countries through various diploma mills, including, but not limited to, "Saint  
14 Regis University," "James Monroe University," "Robertstown University,"  
15 "Trinity Christian School," and others. The businesses were engaged in the  
16 internet sale of fraudulent academic products to consumers throughout the world.  
17 Through these businesses, the defendants sold worthless academic products. As  
18 part of their service, the defendants would manufacture transcripts for consumers  
19 representing that the consumer had taken college-level and graduate-level classes  
20 and achieved grade point averages which had never occurred. The defendants sold  
21 such products to consumers without requiring the consumer to complete any  
22 course work or pass any legitimate testing.

23 12. It was further part of the scheme and artifice to defraud that,  
24 depending on the type of "degree" a consumer wanted to purchase, defendants  
25 DIXIE ELLEN RANDOCK, STEVEN KARL RANDOCK, SR., RICHARD  
26 JOHN NOVAK, BLAKE ALAN CARLSON, AMY LEANN HENSLEY, HEIDI  
27 KAE LORHAN, and ROBERTA LYNN MARKISHTUM, through one or more of  
28 the websites registered either in the name of defendants DIXIE ELLEN

1 RANDOCK and STEVEN KARL RANDOCK, SR., or in the name of a nominee,  
2 charged consumers fees ranging from \$399.00 to in excess of \$2,454.00 per  
3 "degree" and accompanying documents.

4 13. It was further part of the scheme and artifice to defraud that  
5 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR. led  
6 consumers, potential consumers, and others throughout the world to believe that  
7 "St. Regis University," James Monroe University," and Robertstown University"  
8 were legitimate academic institutions of higher learning which had been officially  
9 accredited by the Ministry of Education in Liberia. Consumers were led to believe  
10 that these "universities" had a legitimate campus in Monrovia, Liberia, when in  
11 truth and fact, they had no such campus.

12 14. It was further part of the scheme and artifice to defraud that  
13 defendants DIXIE ELLEN RANDOCK, STEVEN KARL RANDOCK, SR.,  
14 RICHARD JOHN NOVAK, BLAKE ALAN CARLSON, AMY LEANN  
15 HENSLEY, HEIDI KAE LORHAN, and ROBERTA LYNN MARKISHTUM  
16 used fictitious names, titles, and academic pedigrees when communicating with  
17 consumers and employers who were attempting to determine the legitimacy of a  
18 degree.

19 15. It was further part of the scheme and artifice to defraud that  
20 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.  
21 falsely advertised "Robertstown University" on the internet with a web page that  
22 had a photograph of Blenheim Castle, the birthplace of Sir Winston Churchill and  
23 the ancestral home of the Duke of Marlborough, in order to mislead consumers  
24 into believing that the building depicted in the photograph was part of the  
25 "Robertstown University" campus, of which there was none.

26 16. It was further part of the scheme and artifice to defraud that  
27 defendants DIXIE ELLEN RANDOCK, STEVEN KARL RANDOCK, SR.,  
28 BLAKE ALAN CARLSON, RICHARD JOHN NOVAK, HEIDI KAE LORHAN,

1 AMY LEANN HENSLEY, ROBERTA LYNN MARKISHTUM, and KENNETH  
2 WADE PEARSON operated a web of diploma mills and affiliated services  
3 whereby foreign consumers could obtain advanced degrees without ever attending  
4 classes and then use those misleading credentials to obtain H1B Visas in order to  
5 gain entry into, and employment in, the United States of America.

6 17. It was further part of the scheme and artifice to defraud that  
7 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.  
8 owned and operated several "verification" fronts: including, but not limited to, the  
9 "Official Transcript Verification Center," "Official Transcript Archive Center,"  
10 and "Academic Credential Assessment Corporation." These businesses were  
11 created so that the defendants could falsely represent to any employer who sought  
12 verification of a degree which had been purchased that the degree was legitimate.

13 18. It was part of the scheme and artifice to defraud that defendants  
14 DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR. caused to be  
15 fabricated a website entitled [www.liberianembassy.com](http://www.liberianembassy.com) which, to internet  
16 consumers, falsely posed as the legitimate and official government website of the  
17 Liberian Embassy in Washington, D.C.

18 19. It was further part of the scheme and artifice to defraud that  
19 defendants DIXIE ELLEN RANDOCK, STEVEN KARL RANDOCK, SR.,  
20 BLAKE ALAN CARLSON, RICHARD JOHN NOVAK, HEIDI KAE LORHAN,  
21 AMY LEANN HENSLEY, and ROBERTA LYNN MARKISHTUM would solicit  
22 consumers to take a one-hundred-and-twenty-five (125) question test online and  
23 would sell consumers a high school "diploma" even if the consumer only  
24 answered twenty-five percent of the questions correctly.

25 20. It was further part of the scheme and artifice to defraud that, in order  
26 to induce consumers into buying one or more of their false and fraudulent  
27 academic products, defendants DIXIE ELLEN RANDOCK and STEVEN KARL  
28 RANDOCK, SR. solicited consumers through mass-marketing, including the use



1 of "spam" e-mail, the creation of websites on the internet, and advertising in a  
2 national newspaper and magazines.

3 21. It was further part of the scheme and artifice to defraud that, in order  
4 to further the diploma mill fraud scheme in other countries throughout the world,  
5 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.  
6 would partner with individuals in other countries; give those individuals advanced  
7 "degrees" from one or more of their diploma mill businesses in exchange for  
8 allowing those individuals to work as "degree examiners" to "evaluate" and  
9 "process" "degrees;" and then share in the profits generated by consumers from  
10 that country.

11 22. It was further part of the scheme and artifice to defraud that  
12 defendants DIXIE ELLEN RANDOCK, STEVEN KARL RANDOCK, SR.,  
13 BLAKE ALAN CARLSON, RICHARD JOHN NOVAK, HEIDI KAE LORHAN,  
14 AMY LEANN HENSLEY, and ROBERTA LYNN MARKISHTUM created and  
15 advertised a fictitious "faculty" on one or more of the diploma mill business web  
16 pages in order to dupe consumers and employers throughout the world into  
17 believing they operated a legitimate institution of higher learning and the degrees  
18 they sold were legitimate.

19 23. It was further part of the scheme and artifice to defraud that  
20 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.  
21 used mail forwarding boxes in Washington, D.C., and Wilmington, Delaware, in  
22 order to facilitate the interstate shipment of fraudulent academic products sold by  
23 the diploma mills.

24 24. It was further part of the scheme and artifice to defraud that defendant  
25 HEIDI KAE LORHAN, who did not have a high school diploma but who was  
26 listed as having a PhD degree on one or more of the diploma mill websites, and  
27 defendant AMY LEANN HENSLEY "evaluated" consumers in order to determine  
28 what type of fraudulent academic credential would be sold to the consumer;

1 backdated fraudulent academic credentials; communicated with consumers via e-  
2 mail; e-mailed to other employees of the diploma mill businesses "templates" in  
3 order for a fraudulent academic credential to be printed; and prepared fraudulent  
4 "transcripts" for consumers by searching the internet and "cutting and pasting"  
5 course descriptions.

6 25. It was further part of the scheme and artifice to defraud that defendant  
7 ROBERTA LYNN MARKISHTUM printed fraudulent education documents,  
8 using one or more ink stamps to affix "official-looking" signatures to fraudulent  
9 education documents, affixed "official-looking" seals to fraudulent documents,  
10 used a "squisher" or embossing tool to create "official-looking" seals for  
11 fraudulent documents, communicated with consumers via the internet and by mail,  
12 and falsely confirmed via telephone to employers, and potential employers, the  
13 validity of the consumers' fraudulent degrees.

14 26. It was further part of the scheme and artifice to defraud that defendant  
15 BLAKE ALAN CARLSON manufactured and sold signature stamps and seals for  
16 one or more of defendants DIXIE ELLEN RANDOCK and STEVEN KARL  
17 RANDOCK, SR.'s diploma mill businesses, and even though he had never  
18 graduated from college, acted as an "advisor" to consumers who purchased  
19 fraudulent academic products from the diploma mill businesses.

20 27. It was further part of the scheme and artifice to defraud that defendant  
21 BLAKE ALLAN CARLSON allowed himself to be listed as the "Provost" and  
22 "Chief Academic Officer" of "Saint Regis University" and the "Dean of Studies"  
23 and "Chief Provost" of "Robertstown University," as a "tenured professor" at  
24 "Saint Regis University," and as being the "President" and "Chief Provost" of  
25 "James Monroe University."

26 28. It was further part of the scheme and artifice to defraud that defendant  
27 RICHARD JOHN NOVAK worked as a "consultant" to "process" fraudulent  
28 academic documents sold to foreign consumers by one or more of the diploma mill



1 businesses owned by defendants DIXIE ELLEN RANDOCK and STEVEN KARL  
2 RANDOCK, SR., and to travel to Washington, D.C., to obtain "authentication"  
3 documents, "transcript attestations," and "apostilles" for the false academic  
4 products which had been sold to consumers.

5 29. It was further part of the scheme and artifice to defraud that defendant  
6 RICHARD JOHN NOVAK was falsely represented to the public as being  
7 "Professor Dr. Richard Novak, PhD (International Business) and Doctor of  
8 Education (Educational Administration and Psychology);" as being the "Registrar  
9 and Past Chief Provost" who designed and developed the psychology curriculum  
10 for all Saint Regis University branch campuses and sponsor universities; as being  
11 the past president of the Educational Administration Department at "Blackstone  
12 University," and past professor for the MBA program at "Nation State."

13 30. It was further part of the scheme and artifice to defraud that  
14 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.  
15 received in excess of \$1.0 million in connection with their worldwide sale of false  
16 and fraudulent academic products to consumers over the internet.

17 31. It was further part of the scheme and artifice to defraud that  
18 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.  
19 paid defendants BLAKE ALAN CARLSON, RICHARD JOHN NOVAK, HEIDI  
20 KAE LORHAN, AMY LEANN HENSLEY, and ROBERTA LYNN  
21 MARKISHTUM "commissions" and/or a salary for their participation in the sale  
22 of false and fraudulent academic products to consumers and related services.

23 32. It was further part of the scheme and artifice to defraud that defendant  
24 KENNETH WADE PEARSON was responsible for handling the technology  
25 aspects of the diploma mill businesses owned by defendants DIXIE ELLEN  
26 RANDOCK and STEVEN KARL RANDOCK, SR. Defendant KENNETH  
27 WADE PEARSON's primary diploma mill business duties included, among other  
28 things: acting as the "web master" of, and hosting from his residence, multiple

1 diploma mill web sites for defendants DIXIE ELLEN RANDOCK and STEVEN  
2 KARL RANDOCK, SR.; registering numerous domain names, with the majority  
3 being diploma mill and diploma mill-related sites, at the direction of defendant  
4 DIXIE ELLEN RANDOCK; and registering an imposter web domain by the name  
5 of www.liberianembassy.com at defendant DIXIE ELLEN RANDOCK's  
6 direction.

7 33. It was further part of the scheme and artifice to defraud that, in order  
8 to receive payment for the worldwide sales of fraudulent academic products,  
9 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.  
10 opened accounts with PayPal; WorldPay; Cardservice International; American  
11 West Bank, located in Chewelah, Washington; Wells Fargo Bank, located in Las  
12 Vegas, Nevada; US Bank; the Bank of Fairfield located in Fairfield, Washington;  
13 Banc Caribe located in Roseau, Dominica; and Loyal Bank Limited, located in  
14 Kingstown, St. Vincent, West Indies. In order to receive payment for the  
15 worldwide sales of fraudulent academic products, defendants DIXIE ELLEN  
16 RANDOCK and STEVEN KARL RANDOCK, SR. also received Western Union  
17 and other checks from consumers.

18 34. It was further part of the scheme and artifice to defraud that, in order  
19 to ship fraudulent academic products which had been sold to consumers  
20 throughout the world, defendants DIXIE ELLEN RANDOCK, STEVEN KARL  
21 RANDOCK, SR., HEIDI KAE LORHAN, AMY LEANN HENSLEY, ROBERTA  
22 MARKISHTUM, BLAKE ALAN CARLSON, and RICHARD JOHN NOVAK  
23 used DHL, Federal Express, and the United States Postal Service.

24 35. It was further part of the scheme and artifice to defraud that  
25 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.  
26 created the "Academic Credential Assessment Corporation," also known as  
27 ACAC, for the purpose of self-"accrediting" defendants DIXIE ELLEN  
28 RANDOCK and STEVEN KARL RANDOCK, SR.'s diploma mills and to dupe

1 consumers and employers into believing that the academic products defendants  
2 DIXIE ELLEN RANDOCK, STEVEN KARL RANDOCK, SR., HEIDI KAE  
3 LORHAN, AMY LEANN HENSLEY, ROBERTA MARKISHTUM, BLAKE  
4 ALAN CARLSON, and RICHARD JOHN NOVAK were selling were legitimate.  
5 Through ACAC, defendant DIXIE ELLEN RANDOCK and STEVEN KARL  
6 RANDOCK, SR. advertised on the internet that, for a fee of \$110, ACAC would  
7 provide a consumer with an "H 1B Visa Credential Evaluation (based on related  
8 experience)" because "INS requires evidence that candidates for H 1B visas hold  
9 an equivalent of at least a U.S. Bachelor's Degree. Additionally, Green Card  
10 Lottery Winners must show at least an Equivalent of U.S. High School Diploma  
11 and/or two years minimum experience as a skilled worker." The ACAC website  
12 further advertised on the internet that "Individuals who plan to seek licensure or  
13 certification to practice in a particular state in the United States (e.g., teacher,  
14 engineer, physical therapist), will usually need to have their educational  
15 credentials evaluated. Prospective employers often require an evaluation [of] an  
16 individual's foreign degree attesting the equivalency to an appropriate U.S.  
17 education." The ACAC website also created the appearance that it was a  
18 legitimate credential evaluator by containing images of a diploma and individuals  
19 wearing academic gowns and mortar boards with tassels.

20 36. It was further part of the scheme and artifice to defraud that  
21 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.  
22 owned and operated "Advanced Educational Institute Trust," also known as AEIT.  
23 AEIT's business addresses were listed as 14525 Newport Highway, Mead,  
24 Washington, and 601 East Seltice Way, B8, Post Falls, Idaho. AEIT billed  
25 consumers for the sale of fraudulent academic products. "Saint Regis University"  
26 was a subsidiary of AEIT.

27 37. It was further part of the scheme and artifice to defraud that  
28 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.

1 owned "A+ Institute." Its business addresses were listed as 14525 North Newport  
2 Highway, Mead, Washington, and 601 East Seltice Way, Suite 8-B, Post Falls,  
3 Idaho. During the scheme, "A+ Institute" entered into an agreement with  
4 MarketTrends Productions located in California for Markettrends Productions to  
5 host fifty-five domain names, including www.liberiaembassy.com,  
6 www.university-services.net, www.saintregisuniversity.ac,  
7 www.robertstownuniversity.ac, and www.jmuniversity.ac .

#### 8 OVERT ACTS

9 38. The allegations contained in paragraphs 11 through 37 are realleged  
10 and incorporated herein by reference. In furtherance of the agreement and to  
11 accomplish the objects of the conspiracy, one or more of the defendants performed  
12 the following overt acts in the Eastern District of Washington and elsewhere.

#### 13 **Dixie Ellen Randock**

14 39. At a date unknown but at least by on or about February 17, 2001,  
15 defendant DIXIE ELLEN RANDOCK purchased a web hosting plan from  
16 MarkeTrends Productions, Loomis, California, to facilitate the sale of fraudulent  
17 academic products to consumers.

18 40. At a date unknown, but at least while one or more of the diploma  
19 mills was using space at the office building located at 14525 Newport Highway,  
20 Mead, Washington, defendant DIXIE ELLEN RANDOCK instructed defendant  
21 AMY LEANN HENSLEY to forge the signature of defendant BLAKE ALAN  
22 CARLSON and to have a rubber stamp made in order to affix defendant BLAKE  
23 ALAN CARLSON's forged signature on fraudulent academic documents sold to  
24 consumers.

25 41. On or about November 1, 2001, defendant DIXIE ELLEN  
26 RANDOCK sent an e-mail to a mail forwarding service in Washington, D.C., used  
27 by defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.  
28 in connection with their diploma mill businesses, inquiring how often incoming

1 mail would be forwarded to her at 14525 Newport Highway, Mead, Washington.

2 42. In or about 2001, defendants DIXIE ELLEN RANDOCK and  
3 STEVEN KARL RANDOCK, SR. paid defendant AMY LEANN HENSLEY  
4 approximately \$15,390 in commissions in connection with the sale of fraudulent  
5 academic products to consumers.

6 43. In or about 2002, defendants DIXIE ELLEN RANDOCK and  
7 STEVEN KARL RANDOCK, SR. paid defendant AMY LEANN HENSLEY  
8 approximately \$17,808 in commissions in connection with the sale of fraudulent  
9 academic products to consumers.

10 44. At a date unknown, but at least by in or about 2002, defendant DIXIE  
11 ELLEN RANDOCK contacted defendant RICHARD JOHN NOVAK and offered  
12 him a position to process false and fraudulent academic documents sold to  
13 consumers by one or more of her diploma mills.

14 45. On or about April 28, 2003, defendant DIXIE ELLEN RANDOCK  
15 sent an e-mail via the internet to defendant AMY LEANN HENSLEY requesting  
16 defendant AMY LEANN HENSLEY to send by facsimile the following  
17 instructions, among others, to defendant RICHARD JOHN NOVAK in Monrovia,  
18 Liberia: "You can offer money to back date or whatever to get accreditation for  
19 James Monroe and Robertstown. I'd like to have a physical location for all three  
20 but with slightly different addresses. We need three phone numbers for them and  
21 someone to answer to damn phones and say we are fully accredited. I'd like to  
22 hire about 10-20 Liberian professors at \$50-\$100 per month each – they must be  
23 real and available by phone or e-mail. The first time they do not say the right  
24 thing their money gets cut off permanently. I don't even care if the Ed Minister  
25 does nothing but the Higher Education guy makes something up and accredits us  
26 and verifies it by phone. Just something saying 'accreditation.' I think it will work  
27 for our purposes if we can get him to do that."

28 46. In or about May 2003, defendant DIXIE ELLEN RANDOCK

1 submitted an application for AACRAO Institutional Membership on behalf of  
2 "Saint Regis University" representing that defendant BLAKE ALAN CARLSON,  
3 who had no college degree, was the "Provost" of "Saint Regis University" and was  
4 located at "73 Carey Street, West Wing S&G Building, 1000, Monrovia 10  
5 Liberia, West Africa."

6 47. In or about May 2003, defendant DIXIE ELLEN RANDOCK  
7 submitted an application for AACRAO Institutional Membership on behalf of  
8 "Saint Regis University" representing that defendant RICHARD JOHN NOVAK  
9 was the "Registrar" of "Saint Regis University" and was located at "73 Carey  
10 Street, West Wing S&G Building, 1000, Monrovia 10 Liberia, West Africa."

11 48. In or about 2003, defendants DIXIE ELLEN RANDOCK and  
12 STEVEN KARL RANDOCK, SR. paid defendant AMY LEANN HENSLEY  
13 approximately \$46,431 in commissions in connection with the sale of fraudulent  
14 academic products to consumers.

15 49. On or about April 15, 2003, defendant DIXIE ELLEN RANDOCK  
16 instructed defendant AMY LEANN HENSLEY via e-mail on how commissions  
17 for the sale of fraudulent academic products were to be apportioned.

18 50. At a date unknown but at least by on or about June 19, 2003,  
19 defendant DIXIE ELLEN RANDOCK, who was not an employee of the Liberian  
20 Government or the Liberian Embassy in Washington, D.C., set up an e-mail  
21 account entitled "gov@liberiaembassy.com."

22 51. On or about June 19, 2003, defendant DIXIE ELLEN RANDOCK  
23 sent defendant KENNETH WADE PEARSON an e-mail regarding moving the  
24 contents of the imposter Liberian Embassy website that defendants DIXIE ELLEN  
25 RANDOCK and STEVEN KARL RANDOCK, SR. had been operating at  
26 www.liberiaembassy.com to www.liberianembassy.com.

27 52. In or about 2004, defendants DIXIE ELLEN RANDOCK and  
28 STEVEN KARL RANDOCK, SR. paid defendant AMY LEANN HENSLEY



1 approximately \$11,097 in commissions in connection with the sale of fraudulent  
2 academic products to consumers.

3 53. On or about October 2, 2004, defendant DIXIE ELLEN RANDOCK  
4 sent an e-mail to defendant RICHARD JOHN NOVAK instructing defendants  
5 RICHARD JOHN NOVAK and STEVEN KARL RANDOCK, SR. to set up a new  
6 diploma mill without any "history."

7 54. On or about April 6, 2005, defendant DIXIE ELLEN RANDOCK,  
8 using the false identity "Jallah," with an e-mail address of info@university-  
9 services.net, sent an e-mail to a Special Agent with the United States Secret  
10 Service, Department of Homeland Security, who was acting in an undercover  
11 capacity using the name Greg Roberts, and posing as the President of Randolph  
12 Addison Davis Technical University, with the undercover e-mail address of  
13 greginthe desert@hotmail.com, offering to give Greg Roberts advice to "deal with  
14 and overcome the many limitations of laws regarding higher education  
15 regulations."

16 55. On or about April 11, 2005, defendant DIXIE ELLEN RANDOCK,  
17 using the false identity "Jallah," with an e-mail address of info@university-  
18 services.net, sent an e-mail to Greg Roberts regarding "partnership/affiliation/buy-  
19 out/services," recommending him to work with her "International Liaison,"  
20 defendant RICHARD JOHN NOVAK, advising him to "operate offshore,"  
21 representing that she specializes in the establishment of legally authorized  
22 institutes of higher learning, and asserting that she can assist him in the opening of  
23 an offshore corporate bank account and a registered office in Delaware with mail  
24 forwarding services for a fee of \$35,000, and offering a "deeply discounted  
25 Apostille and U.S. and Foreign Embassy Seal service."

26 56. On or about May 2, 2005, defendant DIXIE ELLEN RANDOCK,  
27 using the false identity "Jallah," with an e-mail address of info@university-  
28 services.net, sent an e-mail to Greg Roberts regarding "partnership/affiliation/buy-

1 out/services,” recommending that he contact defendant RICHARD JOHN  
2 NOVAK in Arizona.

3 **Steven Karl Randock, Sr.**

4 57. On or about December 30, 2000, defendant STEVEN KARL  
5 RANDOCK, SR., using the fictitious identity “Fr. Stephen Frendock,” sent a  
6 “sample transcript” to a consumer via the internet and an e-mail advising the  
7 consumer that defendants DIXIE ELLEN RANDOCK and STEVEN KARL  
8 RANDOCK, SR.’s degree verification front, the “Official Record Verification  
9 Center,” would falsely verify to any company, state, county or city agency who  
10 inquired that any degree that one of their diploma mills had sold to the consumer  
11 was legitimate.

12 58. On or about January 2, 2001, defendant STEVEN KARL  
13 RANDOCK, SR., using the fictitious identity “Fr. Stephen Frendock,” sent an e-  
14 mail to a consumer regarding “Degree Evaluation Results” and the sale of a  
15 backdated “Bachelor of Science Degree in Criminal Justice” and a backdated  
16 “Masters in Public Administration Degree,” which the consumer had purchased  
17 from one of defendants DIXIE ELLEN RANDOCK and STEVEN KARL  
18 RANDOCK, SR.’s diploma mills.

19 59. At a date unknown but at least by on or about February 17, 2001,  
20 defendant STEVEN KARL RANDOCK, SR. purchased a web hosting plan from  
21 MarkeTrends Productions, Loomis, California, in order to facilitate the sale of  
22 fraudulent academic products to consumers.

23 60. On or about February 11, 2002, defendant STEVEN KARL  
24 RANDOCK, SR. sent a letter, account opening applications, and other documents  
25 via Registered Mail from Colbert, Washington, to Banc Caribe in Roseau,  
26 Commonwealth of Dominica, West Indies, requesting that funds from the  
27 WorldPay merchant account held in the name of “Saint Regis University (AEIT  
28 Graduate School Peer Degree Program)” be directly deposited into a checking

1 account held in the name of "Saint Regis University (AEIT Peer Degree  
2 Program)" at Banc Caribe.

3 61. On or about May 15, 2002, defendant STEVEN KARL RANDOCK,  
4 SR., acting as an "Administrator" on behalf of "Saint Regis University," purchased  
5 advertising from USA Today.

6 62. On or about June 19, 2003, defendant STEVEN KARL RANDOCK,  
7 SR., using his VISA credit card, paid \$161.95 to register an imposter website  
8 called www.Liberianembassy.com with an e-mail address of  
9 gov@liberianembassy.com.

10 63. On or about October 2, 2003, defendant STEVEN KARL  
11 RANDOCK, SR., acting on behalf of the "Official Transcript Verification Center"  
12 and "Saint Regis Educational Services," rented a mail forwarding box in  
13 Wilmington, Delaware.

14 64. On or about October 2, 2003, defendant STEVEN KARL  
15 RANDOCK, SR., acting on behalf of the "Official Transcript Verification Center"  
16 and "Saint Regis Educational Services," requested PakMail to forward weekly via  
17 Federal Express any mail received at the mail box he rented in Wilmington,  
18 Delaware, to himself at "14525 Newport Highway, Mead, Washington."

19 65. On or about August 18, 2004, defendant STEVE KARL RANDOCK,  
20 SR., rented office space located at the Post Falls Professional Center, 601 East  
21 Seltice Way, Post Falls, Idaho, in order to move some of defendants DIXIE  
22 ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.'s diploma mill  
23 operations to that location.

24 66. On or about June 16, 2005, defendant STEVEN KARL RANDOCK,  
25 SR., executed a resolution that the name "Saint Regis University (AEIT Peer  
26 Degree Program) Graduate Schools, Inc." was changed to the name "AEIT, Inc."

**Heidi Kae Lorhan**

67. On or about January 13, 2003, defendant HEIDI KAE LORHAN instructed defendant AMY LEANN HENSLEY to “run” a payment of \$250 for a PhD for an individual not named in this Indictment because he is “referring a bunch of people.”

68. At a date unknown, but at least by February 28, 2005, defendant HEIDI KAE LORHAN used the fictitious identity “Advisor James” when communicating with consumers throughout the world.

**Jeffrey Rowley Transaction**

69. On or about February 28, 2005, defendant HEIDI KAE LORHAN, using the fictitious identity “Advisor James” from “James Monroe University,” with an e-mail address of “counselor0@advancedu.org”, sent an e-mail from “University-Services<forward1@university-services.net>” to a Special Agent with the United States Secret Service, Department of Homeland Security, who was acting in an undercover capacity as a high school dropout using the name Jeffrey Rowley, and who was using the undercover e-mail address rowleygolf@yahoo.com, thanking Jeffrey Rowley for his interest in the “Degrees By Exam Program,” and advising him that in order to test “for qualification for a High School Diploma and/or Associate of Arts Degree” to “proceed to www.university-services.net/james\_sru/high\_school/test.html” or to test “for qualification for a Bachelor Degree” to “proceed to your exam at www.advancedu.org/test\_site\_degrees\_by\_exam\_01.htm.”

70. On or February 28, 2005, defendant HEIDI KAE LORHAN caused an e-mail from info@gradsonline.org to be sent to Jeffrey Rowley notifying him that he had successfully registered at E-Grads, providing him with a password, instructing him to take an exam, notifying him that he will be taken to PayPal to pay his graduation fee and that he will be a graduate the moment he has passed the exam and paid the graduation fee, and notifying him that his “diploma and

1 transcripts may be printed out, or saved for later use, or e-mailed to whomever."

2 71. On or about March 1, 2005, defendant HEIDI KAE LORHAN, using  
3 the fictitious identity "James," sent an e-mail from "University-  
4 Services<forward1@university-services.net>" to Jeffrey Rowley referring him to  
5 "Breyer State U," and two other universities that would accept the "Monroe  
6 University Diploma and AA degree" sold to him.

7 72. On or about March 16, 2005, defendant HEIDI KAE LORHAN,  
8 using the fictitious identity "James" and fictitious title "Admissions Assistant,"  
9 sent an e-mail from "University-Services<forward1@university-services.net>" to  
10 Jeffrey Rowley at the e-mail address rowleygolf@yahoo.com, notifying Jeffrey  
11 Rowley that "James Monroe University's Office of Admissions" had approved  
12 him for a "Bachelor of Arts in Liberal Arts" degree and a "Bachelor of Arts in  
13 Business Administration" degree; that "all academic requirements have been met  
14 and there are no further courses to take;" that Jeffrey Rowley was "in the top  
15 percentage of applicants;" that "James Monroe University" accepts payment for a  
16 "graduation fee" by Visa, Mastercard, American Express, PayPal, bank wire  
17 transfer, and check; and that he could pay online at www.university-  
18 services.net/jamesmonroe/fp\_ja.html.

19 73. On or about April 1, 2005, defendant HEIDI KAE LORHAN, using  
20 the fictitious identity "James," sent an e-mail from "University-  
21 Services<forward1@university-services.net>" to Jeffrey Rowley at the e-mail  
22 address rowleygolf@yahoo.com, attaching proofs of the fraudulent academic  
23 products he purchased.

24 74. On or about April 2, 2005, defendant HEIDI KAE LORHAN, using  
25 the fictitious identity "James," sent an e-mail from "University-  
26 Services<forward1@university-services.net>" to Jeffrey Rowley at the e-mail  
27 address rowleygolf@yahoo.com, notifying Jeffrey Rowley that the fraudulent  
28 academic products he purchased would be printed and shipped to him.

**Anthony Gwynn Transaction**

75. On or about March 3, 2005, defendant HEIDI KAE LORHAN sent an e-mail from "University-Services<forward1@university-services.net>" to a Special Agent with the United States Secret Service, Department of Homeland Security, who was acting in an undercover capacity using the name Anthony Aaron Gwynn and who was using the undercover e-mail address Agonthebeach@hotmail.com, to send documents by facsimile to 202-318-0568 within three business days.

76. On or about March 10, 2005, defendant HEIDI KAE LORHAN, using the fictitious identity "James" and fictitious title "Admissions Assistant," sent an e-mail from "University-Services<forward1@university-services.net>" to Anthony Gwynn at the e-mail address Agonthebeach@hotmail.com, notifying Anthony Gwynn that: "James Monroe University's Office of Admissions" had approved him for "degrees" in "Bachelor of Arts in Business Administration" and "Bachelor of Business Administration in Business Administration;" "James Monroe University takes pride in its graduates;" Anthony Gwynn was "in the top percentage of applicants;" "James Monroe University" accepts payment for "graduation fees" by Visa, Mastercard, American Express, PayPal, bank wire transfer, and check; and he could pay online at www.university-services.net/jamesmonroe/fp\_ja.html.

77. On or about March 10, 2005, defendant HEIDI KAE LORHAN, using the fictitious identity "James," sent an e-mail from "University-Services<forward1@university-services.net>" to Anthony Gwynn at the e-mail address Agonthebeach@hotmail.com, thanking Anthony Gwynn for his payment of \$2,454 in graduation fees.

78. On or about March 10, 2005, defendant HEIDI KAE LORHAN, using the fictitious identity "James," sent an e-mail from "University-



1 Services<forward1@university-services.net>” to Anthony Gwynn at the e-mail  
2 address Agonthebeach@hotmail.com, attaching “proofs” of the “degree” and  
3 “Dean’s List” he purchased from “James Monroe University” and notifying him  
4 that “seals, signatures, borders and backgrounds will appear on your original  
5 documents.”

6 79. On or about March 21, 2005, defendant HEIDI KAE LORHAN,  
7 using the fictitious identity “James,” sent an e-mail from “University-  
8 Services<forward1@university-services.net>” to Anthony Gwynn at the e-mail  
9 address Agonthebeach@hotmail.com, notifying Anthony Gwynn that the  
10 academic products he purchased would be printed and shipped.

11 **Mohammed Syed Transaction**

12 80. On or about April 19, 2005, defendant HEIDI KAE LORHAN sent an  
13 e-mail from “University-Services<forward1@university-services.net>” to a Special  
14 Agent with the United States Secret Service, Department of Homeland Security,  
15 who was acting in an undercover capacity using the name Mohammed Syed, and  
16 posing as a retired Syrian military officer who wanted to quickly acquire college  
17 degrees so he could find employment and obtain an H1-B Visa to remain in the  
18 United States, and using the undercover e-mail address  
19 “msayedholland@juno.com”, to send documents by facsimile to 202-318-0568.

20 81. On or about April 21, 2005, defendant HEIDI KAE LORHAN, using  
21 the fictitious identity of “James,” sent an e-mail from “University-  
22 Services<forward1@university-services.net>” to Mohammed Syed at the e-mail  
23 address “msayedholland@juno.com”, notifying Mohammed Syed that his  
24 documentation was being reviewed for verification and authenticity, which would  
25 take approximately forty-eight (48) hours.

26 82. On or about May 13, 2005, defendant HEIDI KAE LORHAN, using  
27 the fictitious identity of “James,” sent an e-mail from “University-  
28 Services<forward1@university-services.net>” to Mohammed Syed at the e-mail

1 address "[msayedholland@juno.com](mailto:msayedholland@juno.com)", requesting Mohammed Syed to specify  
2 what "James Monroe University" "degree" he wanted.

3 83. On or about May 14, 2005, defendant HEIDI KAE LORHAN, using  
4 the fictitious identity of "James," sent an e-mail from "[University-Services<forward1@university-services.net>](mailto:University-Services<forward1@university-services.net>)" to Mohammed Syed at the e-mail  
5 address "[msayedholland@juno.com](mailto:msayedholland@juno.com)", notifying Mohammed Syed that "James  
6 Monroe University" could grant "degrees" in environmental engineering and  
7 chemistry.  
8

9 84. On or about May 17, 2005, defendant HEIDI KAE LORHAN, using  
10 the fictitious identity "James Hunter" of the "Admissions" Office of "James  
11 Monroe University," sent an e-mail from "[University-Services<forward1@university-services.net>](mailto:University-Services<forward1@university-services.net>)" to Mohammed Syed at the e-mail  
12 address "[msayedholland@juno.com](mailto:msayedholland@juno.com)", notifying Mohammed Syed that "James  
13 Monroe University's Office of Admissions" had approved him for the following  
14 "degrees:" "Bachelor of Science in Environmental Engineering;" "Bachelor of  
15 Science in Chemistry;" "Master of Science in Environmental Engineering;" and  
16 "Master of Science in Chemistry;" that "James Monroe University takes pride in  
17 its graduates;" that Mohammed Syed was "in the top percentage of applicants;"  
18 that "James Monroe University" accepts payment for "graduation fees" by Visa,  
19 Mastercard, American Express, PayPal, bank wire transfer, and check; and that he  
20 could pay online at [www.university-services.net/jamesmonroe/fp\\_ja.html](http://www.university-services.net/jamesmonroe/fp_ja.html) or by  
21 telephone.  
22

23 85. On or about May 19, 2005, defendant HEIDI KAE LORHAN, using  
24 the fictitious identity of "James," sent an e-mail from "[University-Services<forward1@university-services.net>](mailto:University-Services<forward1@university-services.net>)" to Mohammed Syed at the e-mail  
25 address "[msayedholland@juno.com](mailto:msayedholland@juno.com)", requesting Mohammed Syed to resubmit his  
26 payment for his fraudulent "James Monroe University" academic documents at  
27 [www.university-services.net/jamesmonroe/fp\\_ja.html](http://www.university-services.net/jamesmonroe/fp_ja.html).  
28

1           86. On or about May 22, 2005, defendant HEIDI KAE LORHAN, using  
2 the fictitious identity of "James," sent an e-mail from "University-  
3 Services<forward1@university-services.net>" to Mohammed Syed at the e-mail  
4 address "msayedholland@juno.com", attaching "proofs" of the fraudulent  
5 "degrees" he purchased from "James Monroe University" and notifying him that  
6 "seals, signatures, borders and backgrounds will appear on your original  
7 documents."

8           87. On or about May 23, 2005, defendant HEIDI KAE LORHAN, using  
9 the fictitious identity of "James," sent an e-mail from "University-  
10 Services<forward1@university-services.net>" to Mohammed Syed at the e-mail  
11 address "msayedholland@juno.com", notifying Mohammed Syed that the  
12 academic products he purchased would be printed and shipped.

13 **Amy Leann Hensley**

14           88. At a date unknown, but beginning at least in or about 2001, defendant  
15 AMY LEANN HENSLEY used the fictitious identity "Advisor Tim" when  
16 communicating over the internet with consumers about fraudulent academic  
17 products.

18           89. At a date unknown, but at least by on or about January 12, 2001,  
19 defendant AMY LEANN HENSLEY fabricated an identity and falsely represented  
20 herself as being "Elizabeth A. Worthington" to consumers and companies that  
21 wanted a verification of an employee's or potential employee's educational  
22 achievements.

23           90 On or about January 12, 2001, defendant AMY LEANN HENSLEY,  
24 using the false identity "Elizabeth A. Worthington" of the "Evaluation and  
25 Endorsement Center, P.O. Box 3043, Coeur d'Alene, Idaho 83816, 1-800-375-  
26 5033 Graduate Records," sent several false documents (including a certification of  
27 graduation) via facsimile transmission overseas to a degree consumer's employer's  
28 Personnel Office.

1           91. At a date unknown, but at least by on or about January 12, 2001,  
2 defendant AMY LEANN HENSLEY stamped or signed several fraudulent  
3 academic documents under the fabricated name of "Elizabeth A. Worthington,"  
4 including a transcript for an individual who purchased a Bachelor of Science in  
5 Medical Engineering "degree" from one of defendants DIXIE ELLEN  
6 RANDOCK and STEVEN KARL RANDOCK, SR.'s diploma mill businesses.

7           92. On or about June 15, 2004, defendant AMY LEANN HENSLEY sent  
8 an e-mail to a consumer in Riyadh, Saudi Arabia, instructing the consumer to pay  
9 AEIT \$1,670 in fees via Western Union for a fraudulent "degree."

10          93. At a date unknown, but at least by on or about March 10, 2005,  
11 defendant AMY LEANN HENSLEY, using the rubber stamp which contained the  
12 forged signature of defendant BLAKE ALAN CARLSON, affixed defendant  
13 BLAKE ALAN CARLSON'S signature as the "Chief Provost" of "James Monroe  
14 University" to a "Bachelor of Arts in Business Administration Degree," which had  
15 been sold to a United States Department of Homeland Security, Secret Service  
16 Special Agent, who was acting in an undercover capacity using the name Anthony  
17 Aaron Gwynn.

18          94. At a date unknown, but at least by on or about April 28, 2005, and in  
19 order to continue to work for the diploma mill from her house, defendant AMY  
20 LEANN HENSLEY removed one of the computers from one of the diploma mill  
21 operations centers located at 601 East Seltice Way, Suite 8B, Post Falls, Idaho, to  
22 her residence located in Spokane, Washington.

23 **Roberta Lynn Markishtum**

24          95. Beginning in or about 2002, defendant ROBERTA LYNN  
25 MARKISHTUM, printed from the basement of a building located at 14525 North  
26 Newport Highway, Mead, Washington, numerous false and fraudulent academic  
27 products which had been sold to consumers by defendants DIXIE ELLEN  
28 RANDOCK and STEVEN KARL RANDOCK, SR.'s diploma mills.

1           96. Beginning in or about 2002, defendant ROBERTA LYNN  
2 MARKISHTUM answered telephone inquiries regarding defendants DIXIE  
3 ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.'s diploma mill  
4 businesses, received payments from consumers who had purchased fraudulent  
5 academic products, and processed credit card payments.

6           97. Beginning in or about 2002, defendant ROBERTA LYNN  
7 MARKISHTUM, at defendant DIXIE ELLEN RANDOCK's instructions, would  
8 falsely represent to diploma mill consumers that she was physically located in  
9 Delaware or Washington, D.C., when, in truth and fact, she was located in Post  
10 Falls, Idaho, or Mead, Washington.

11           98. Beginning in or about 2002, defendant ROBERTA LYNN  
12 MARKISHTUM, at defendant DIXIE ELLEN RANDOCK's instructions, falsely  
13 represented to consumers that defendants DIXIE ELLEN RANDOCK and  
14 STEVEN KARL RANDOCK, SR.'s "schools" were located in West Africa, when  
15 in truth and fact, they were located in the States of Washington and Idaho.

16           99. Beginning in or about 2002, defendant ROBERTA LYNN  
17 MARKISHTUM would manufacture false and fraudulent transcripts for  
18 consumers who had paid fees to defendants DIXIE ELLEN RANDOCK and  
19 STEVEN KARL RANDOCK, SR.'s diploma mill businesses.

20           100. Beginning in or about 2002, defendant ROBERTA LYNN  
21 MARKISHTUM was instructed by defendant DIXIE ELLEN RANDOCK to mail  
22 fraudulent academic products to consumers the cheapest way possible.

23           101. Beginning in or about 2002, defendant ROBERTA LYNN  
24 MARKISHTUM communicated with consumers via the internet using the e-mail  
25 address "printer@university-services.net."

26           102. On or about August 30, 2004, defendant ROBERTA LYNN  
27 MARKISHTUM, using the e-mail address "printer@university-services.net."  
28 notified a consumer that she had received payment for the fabricated transcript and

1 the fabricated transcript would be mailed to the consumer.

2 103. On or about September 2, 2004, defendant ROBERTA LYNN  
3 MARKISHTUM, using the e-mail address "printer@university-services.net,"  
4 communicated to a consumer that she would send the documents regarding his  
5 "degrees" via overnight delivery.

6 104. On or about September 2, 2004, defendant ROBERTA LYNN  
7 MARKISHTUM, using the e-mail address "printer@university-services.net,"  
8 communicated to a consumer notifying the consumer that the fraudulent PhD  
9 apostille he had purchased had been shipped to the consumer via DHL.

10 105. On or about September 10, 2004, defendant ROBERTA LYNN  
11 MARKISHTUM, using the e-mail address "printer@university-services.net,"  
12 communicated to a consumer regarding the shipment of fraudulent academic  
13 products to the consumer in India.

14 106. On or about September 15, 2004, defendant ROBERTA LYNN  
15 MARKISHTUM, using the e-mail address "printer@university-services.net,"  
16 communicated with defendant DIXIE ELLEN RANDOCK, who was using the e-  
17 mail address "forwardinfo@university-services.net," regarding a fraudulent  
18 "diploma" a consumer in New Jersey had purchased from one of defendants  
19 DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.'s diploma mill  
20 businesses.

21 107. On or about May 3, 2005, defendant ROBERTA LYNN  
22 MARKISHTUM, using an Idaho telephone number, falsely identified herself as  
23 being "Jennifer Greene" of "OTAC" in Delaware to a Special Agent, United States  
24 Secret Service, Department of Homeland Security, who was acting in an  
25 undercover capacity, using the name Bob Winthrop. The undercover agent posed  
26 as an employee of the Transportation Security Administration (TSA) who was  
27 attempting to verify the academic credentials of Jeffrey Rowley, who had applied  
28 as a baggage screener for TSA. Defendant ROBERTA LYNN MARKISHTUM



1 represented that Jeffrey Rowley had been a student of "James Monroe University,"  
2 and had obtained an Associate of Arts degree and a Bachelor of Arts degree in  
3 Pre-law from "James Monroe University."

4 108. On or about May 19, 2005, defendant ROBERTA LYNN  
5 MARKISHTUM falsely identified herself as being "Jennifer Greene" of "OTAC"  
6 to a Special Agent, United States Secret Service, Department of Homeland  
7 Security, who was acting in an undercover capacity, using the name Bob  
8 Winthrop, and posing as an employee of the Transportation Security  
9 Administration, and falsely represented that "James Monroe University" was fully  
10 accredited, was equivalent in accreditation to the University of Phoenix, and that  
11 "James Monroe University" required full course work for each class and degree  
12 program.

13 **Richard John Novak**

14 109. At a date unknown, but at least by in or about 2002, defendant  
15 RICHARD JOHN NOVAK made numerous trips to Washington, D.C., in order to  
16 process and obtain "apostilles" for false and fraudulent "degrees" sold to  
17 consumers by one or more of defendants DIXIE ELLEN RANDOCK and  
18 STEVEN KARL RANDOCK, SR.'s diploma mills.

19 110. In or about 2002, at the request of defendants DIXIE ELLEN  
20 RANDOCK and STEVEN KARL RANDOCK, SR., defendant RICHARD JOHN  
21 NOVAK traveled to Monrovia, Liberia, in order to open a small office in Liberia,  
22 hire a person who could answer the telephone, saying "Saint Regis" or "James  
23 Monroe" and to create the appearance to consumers that "Saint Regis University"  
24 and "James Monroe University" were legitimate Liberian institutions of higher  
25 learning.

26 111. At a date unknown, but in or about 2002, defendant RICHARD  
27 JOHN NOVAK provided "signature samples" to defendants DIXIE ELLEN  
28 RANDOCK and STEVEN KARL RANDOCK, SR. in order for his signature to be

1 affixed to fraudulent academic products sold to consumers.

2 112. On or about July 22, 2002, defendant RICHARD JOHN NOVAK  
3 traveled to Washington, D.C., on behalf of defendants DIXIE ELLEN RANDOCK  
4 and STEVEN KARL RANDOCK, SR., in order to obtain apostilled and notarized  
5 documents for consumers who had purchased fraudulent academic products.

6 113. At a date unknown, but at least by in or about 2003, defendant  
7 RICHARD JOHN NOVAK made several trips to Liberia and met with individuals  
8 not named in this Indictment regarding one or more of defendants DIXIE ELLEN  
9 RANDOCK and STEVEN KARL RANDOCK, SR.'s diploma mills.

10 114. On or about January 14, 2003, defendant RICHARD JOHN NOVAK  
11 traveled to Washington, D.C., for the purpose of obtaining "apostilles" for  
12 fraudulent academic products sold to consumers by defendants DIXIE ELLEN  
13 RANDOCK and STEVEN KARL RANDOCK, SR.

14 115. On or about May 17, 2005, defendant RICHARD JOHN NOVAK,  
15 using the e-mail address "degrees@university-services.net." communicated with a  
16 Special Agent with the United States Secret Service, Department of Homeland  
17 Security, who was acting in an undercover capacity using the name Greg Roberts,  
18 and who was posing as a businessman interested in affiliating with, or purchasing  
19 one of defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK's  
20 diploma mill businesses, via the internet that defendants DIXIE ELLEN  
21 RANDOCK and STEVEN KARL RANDOCK, SR. were interested in selling  
22 'Robertstown University.'

23 116. Beginning in or about 2002, and continuing until in or about 2005,  
24 defendant RICHARD JOHN NOVAK received approximately \$40,000 from  
25 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR. for  
26 his services to the diploma mill businesses.

1 **Blake Alan Carlson**

2 117. Beginning in or about 2001, defendant BLAKE ALAN CARLSON  
3 manufactured numerous false and fraudulent rubber stamps and seals for  
4 defendants DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR. to  
5 use on fraudulent documents sold to consumers by their diploma mill businesses.

6 118. At a date unknown, but at least by in or about 2002, defendant  
7 BLAKE ALAN CARLSON purchased a laptop computer so he could  
8 communicate with potential consumers throughout the world about selling them  
9 false and fraudulent academic products.

10 119. In or about 2002, defendant BLAKE ALAN CARLSON was  
11 instructed by defendant DIXIE ELLEN RANDOCK to send out a form letter to  
12 potential consumers of defendants DIXIE ELLEN RANDOCK and STEVEN  
13 KARL RANDOCK, SR.'s diploma mill products.

14 120. On or about October 26, 2003, defendant BLAKE ALAN  
15 CARLSON, using the e-mail address "admin@degreetoday.com," instructed  
16 another individual not named in this Indictment to set up a special bank account in  
17 order for "Saint Regis University" to receive payment for fraudulent degrees it was  
18 going to sell.

19 121. On or about June 10, 2004, defendant BLAKE ALAN CARLSON,  
20 using the e-mail address "admin@degreetoday.com," notified an individual that  
21 "World Chapel Ministries" was the "theological division" of "Saint Regis  
22 University."

23 122. On or about August 30, 2004, defendant BLAKE ALAN CARLSON  
24 e-mailed defendant ROBERTA LYNN MARKISHTUM, instructing her to print  
25 backdated academic documents purchased by a consumer; to charge the  
26 consumer's credit card fifty-percent of the normal fee; and to print a false Liberian  
27 accreditation document on the back of the consumer's transcript.

28 123. On or about July 28, 2005, defendant BLAKE ALAN CARLSON

1 communicated with a consumer who had previously purchased a Bachelor and  
2 Masters "degree" from Saint Regis University about sending the consumer's  
3 potential employer documents which would falsely represent that the consumer's  
4 degree was from a legitimate university.

5 124. On or about August 1, 2005, defendant BLAKE ALAN CARLSON  
6 forwarded an e-mail he had received from a consumer who had purchased  
7 fraudulent academic products from "Saint Regis University" to defendants DIXIE  
8 ELLEN RANDOCK and STEVEN KARL RANDOCK, SR. regarding the  
9 consumer's request that, in order to qualify for a job that pays \$15,000 more than  
10 what she was currently earning, defendants BLAKE ALAN CARLSON, DIXIE  
11 ELLEN RANDOCK, and STEVEN KARL RANDOCK, SR. send by United  
12 States mail, facsimile transmission, and e-mail an accreditation verification to the  
13 Human Resources Department of the consumer's potential employer.

14 125. On or about August 3, 2005, defendant BLAKE ALAN CARLSON,  
15 using the e-mail address "blake@spokanedance.com," forwarded an e-mail that he  
16 had received from info@university-services.net notifying the consumer that she  
17 will be charged \$300 for such an accreditation report.

18 **Kenneth Wade Pearson**

19 126. Beginning in or about 2002, and continuing to on or about August 11,  
20 2005, defendant KENNETH WADE PEARSON hosted several of defendants  
21 DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.'s diploma mill  
22 and related websites from computers located at his residence in Spokane,  
23 Washington.

24 127. In or about 2002, at the instruction of defendant DIXIE ELLEN  
25 RANDOCK, defendant KENNETH WADE PEARSON sent "spam" e-mail to  
26 potential consumers of defendants DIXIE ELLEN RANDOCK and STEVEN  
27 KARL RANDOCK, SR.'s diploma mill products.

1 128. In or about 2002, defendant KENNETH WADE PEARSON printed  
2 "archived transcripts" at the request of defendant DIXIE ELLEN RANDOCK.

3  
4 129. Beginning in or about 2002, defendant KENNETH WADE  
5 PEARSON forwarded e-mail messages in connection with defendants DIXIE  
6 ELLEN RANDOCK and STEVEN KARL RANDOCK, SR.'s diploma mill  
7 businesses.

8 130. In or about 2003, at the instruction of defendant DIXIE ELLEN  
9 RANDOCK, defendant KENNETH WADE PEARSON registered a web domain  
10 by the name of www.liberianembassy.com.

11 131. At a date unknown, but at least by on or about August 11, 2005,  
12 defendant KENNETH WADE PEARSON built a computer system for defendant  
13 RICHARD JOHN NOVAK to use in connection with the sale of fraudulent  
14 degrees.

15 All in violation of Title 18, United States Code, Sections 371, 1341, and  
16 1343.

17 COUNT 2

18 (Conspiracy to Launder Monetary Instruments)

19 132. The Allegations set forth in Paragraphs 1 through 131 are realleged  
20 and incorporated herein by reference.

21 133. That beginning on a date unknown but at least during 2002, until on  
22 or about November 16, 2004, in the Eastern District of Washington, defendants  
23 DIXIE ELLEN RANDOCK and STEVEN KARL RANDOCK, SR. did willfully  
24 and knowingly combine, conspire, confederate and agree with each other and with  
25 other persons, both known and unknown to the Grand Jury, to commit the  
26 following offenses against the United States, to wit: laundering monetary  
27 instruments with the intent to promote the scheme and artifice to defraud by  
28 selling fraudulent academic products, to disguise the nature, the location, the

source, the ownership and the control of the proceeds of the scheme and artifice to defraud, and to transport, transmit, transfer, attempt to transport, transmit, and transfer the proceeds of the scheme and artifice to defraud, from a place in the United States to or through a place outside the United States, from a place outside the United States to a place outside the United States, and to a place in the United States from or through a place outside the United States, with the intent to promote the scheme and artifice to defraud, knowing that the monetary instruments involved in the transportation represented the proceeds from the scheme and artifice to defraud by wire and mail fraud and knowing that such transportation, transmission, transfer, and attempted transportation, transmission, and transfer was designed in whole or in part to conceal and disguise the nature, location, source, ownership, and the control of the proceeds of the scheme and artifice to defraud, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i), (B)(I), and 1957(a) and Title 18 United States Code, Sections 1956(a)(2)(A) and (B)(i); all in violation of Title 18 United States Code, Section 1956(h). In furtherance of said conspiracy, one or more of the defendants conducted the following transactions:

Item	Date	Amount Deposited	Description
1	7/23/02	\$52,777.33	Wire Transfer
2	8/2/02	\$50,000.00	Transfer from Checking to Savings
3	8/30/02	\$12,846.92	Wire Transfer
4	9/13/02	\$17,760.14	Wire Transfer
5	9/20/02	\$ 8,010.94	Wire Transfer
6	9/24/02	\$50,000.00	Wire Transfer
7	9/27/02	\$ 9,870.99	Wire Transfer
8	10/11/02	\$12,506.16	Wire Transfer
9	11/08/02	\$ 9,601.17	Wire Transfer
10	12/02/02	\$11,682.79	Wire Transfer



1	11	12/20/02	\$10,235.06	Wire Transfer
2	12	12/27/02	\$10,570.16	Wire Transfer
3	13	1/2/03	\$100,000.00	Transfer from Checking to Savings
4	14	1/10/03	\$13,102.10	Wire Transfer
5	15	1/16/03	\$10,012.00	Wire Transfer
6	16	1/17/03	\$14,649.87	Wire Transfer
7	17	1/24/03	\$11,094.85	Wire Transfer
8	18	11/13/03	\$194,638.88	Wire Transfer
9	19	11/28/03	\$12,495.92	Wire Transfer
10	20	3/22/04	\$30,300.00	Cashier's Check
11	21	3/22/04	\$30,300.00	Cashier's Check
12	22	3/22/04	\$32,300.00	Check
13	22	5/4/04	\$15,000.00	Wire Transfer
14	23	5/21/04	\$20,250.00	Check
15	24	5/21/04	\$20,250.00	Check Deposit
16	25	7/6/04	\$31,119.56	Wire Transfer
17	26	7/12/04	\$30,000.00	Cashier's Check
18	25	7/13/04	\$30,000.00	Check
19	26	8/10/04	\$18,000.00	Check Deposit
20	27	10/4/04	\$20,000.00	Wire Transfer
21	28	11/10/04	\$60,000.00	Check
22	29	11/10/04	\$60,000.00	Cashier's Check
23	30	11/16/04	<u>\$17,500.00</u>	Wire Transfer
24	<b>Total</b>		<b>\$1,026,874.80</b>	

## Count 3

## (Criminal Forfeiture)

Forfeiture Pursuant to Title 18, United States Code, Section 981

134. Upon conviction of the offense alleged in Count 1 of this Indictment, defendants DIXIE ELLEN RANDOCK, STEVEN KARL RANDOCK, SR., RICHARD JOHN NOVAK, BLAKE ALAN CARLSON, AMY LEANN HENSLEY, HEIDI KAE LORHAN, ROBERTA LYNN MARKISHTUM, and KENNETH PEARSON each shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), any property constituting or derived from proceeds obtained directly or indirectly as a result of the conspiracy including, but not limited to, the following:

REAL PROPERTY

135. All that lot or parcel of land, together with its buildings, appurtenances, improvements, fixtures, attachments and easements, located at 3127 East River Glen Drive, Colbert, Washington, (title to said real property is vested in Dixie E. Randock, as Trustee of the Children's Future Revocable Trust, a trust), and Parcel Number 37033.9138 located in Spokane County, Washington, (title to said real property is vested in Steven Randock and Dixie E. Randock, husband and wife), more particularly described as:

3127 East River Glen Drive, Colbert, Washington:

That portion of the Southwest Quarter of Section 3, Township 27 North, Range 43 East, W.M. described as follows:

Beginning at the Southwest Corner of Section 3; thence North 00°04'10" East 73 feet to the True Point of Beginning; thence continuing North 00°04'10" East 587 feet along the section line; thence South 89°52'45" East 1,422.87 feet; thence South 00°04'10" West 22.81 feet to the centerline of the Little Spokane River; thence South 79°12' West 140 feet; thence South 50°50' West 530 feet; thence South 18°54'06" West 181.74 feet; thence South 00°26'24" West 30 feet; thence North 89°52'45" West 816.01 feet to the True Point of Beginning; Except County Rd;

Also Except the West 400 Feet Thereof.

1 Together with all appurtenances, fixtures, attachments,  
2 and improvements thereto and thereupon.

3 SUBJECT to any easements, rights of way, reservations  
4 and/or exceptions of record.

5 Parcel Number 37033.9138, located in Spokane County,  
6 Washington:

7 The West 440 feet of that portion of the Southwest  
8 Quarter of Section 3; Township 27 North, Range 43  
9 East, W.M., described as follows;

10 Beginning at the Southwest Corner of Section 3; thence  
11 North 00°04'10" East 73 feet to the True Point of  
12 Beginning; thence continuing North 00°04'10" East 587  
13 feet along the section line; thence South 89°52'45" East  
14 1,422.87 feet; thence South 00°04'10" West 22.81 feet to  
15 the centerline of the Little Spokane River; thence South  
16 79°12' West 140 feet; thence South 50°50' West 530  
17 feet; thence South 18°54'06" West 181.74 feet; thence  
18 South 00°26'24" West 30 feet; thence North 89°52'45"  
19 West 816.01 feet to the True Point of Beginning; Except  
20 County Rd;

21 Together with all appurtenances, fixtures, attachments,  
22 and improvements thereto and thereupon.

23 SUBJECT to any easements, rights of way, reservations  
24 and/or exceptions of record.

25 CURRENCY

26 \$10,320.00 United States currency seized on or  
27 about August 11, 2005, from Steven Randock and Dixie  
28 Randock.

CONVEYANCE

2001 Jaguar XK8, VIN: SAJDA42CX1NA13599.

SAFE DEPOSIT BOX

\$43,600.00 United States currency discovered and  
seized on or about August 11, 2005, from safe deposit  
box #155, located at American West Bank, rented by  
Lawrence ("Larry") Randock and/or Steven K. Randock,  
Sr.

FUNDS SEIZED FROM BANK ACCOUNTS

1) Funds in the amount of \$2,042.54 United  
States currency, held in the name of AEIT, Inc., and/or

1 Steven Randock and Dixie Randock, seized from Wells  
 2 Fargo Bank Account Number XXX-XXX2052 on or  
 about August 11, 2005; and,

3 2) Funds in the amount of \$555.43 United  
 4 States currency, held in the name of AEIT and/or Steven  
 5 Randock and Dixie Randock, seized from Bank of  
 Fairfield Account Number XXXX8759 on or about  
 August 11, 2005.

6 BANK ACCOUNT(S)

7 1) \$280,000.00 United States funds or other  
 8 monetary instruments credited to Banc Caribe Account  
 9 Number CK-XX0941, held in the name of Saint Regise  
 University (AEIT Peer Degree Program) Graduate  
 School, and/or Steven Randock and Dixie Randock;

10 2) \$150,000.00 United States funds or other  
 11 monetary instruments credited to Banc Caribe Account  
 12 Number SV-XX0084, held in the name of Saint Regise  
 University (AEIT Peer Degree Program) Graduate  
 School, and/or Steven Randock and Dixie Randock; and,

13 3) \$50,000.00 United States funds or other  
 14 monetary instruments credited to Loyal Bank, Limited  
 15 Account Number XXXXXXXXX2405, held in the names  
 of Steven K Randock and Dixie Randock.

16 If any of the above-described forfeitable property, as a result of any act or  
 17 omission of the defendant(s):

- 18 (a) cannot be located upon the exercise of due diligence;  
 19 (b) has been transferred or sold to, or deposited with, a third party;  
 20 (c) has been placed beyond the jurisdiction of the court;  
 21 (d) has been substantially diminished in value; or  
 22 (e) has been commingled with other property which cannot be divided without  
 difficulty;

23 it is the intent of the United States, pursuant to Title 21, United States Code,  
 24 Section 853(p) as incorporated by Title 18, United States Code, Section 981 and  
 25 Title 28, United States Code, Section 2461, to seek forfeiture of any other property  
 of said defendant(s) up to the value of the forfeitable property described above.

26 Forfeiture Pursuant to Title 18, United States Code, Section 982(a)(1)

27 Pursuant to Title 18, United States Code, Section 982(a)(1), each defendant  
 28 who is convicted of one or more of the offenses set forth in Count 2 shall forfeit to

1 the United States the following property:

2 a) All right, title, and interest in any and all property involved in each  
3 offense in violation of Title 18, United States Code, Section 1956, or conspiracy to  
4 commit such offense, for which the defendant is convicted, and all property  
5 traceable to such property, including the following: 1) all money or other property  
6 that was the subject of each transaction, transportation, transmission or transfer in  
7 violation of Title 18, United States Code, Section 1956; 2) all commissions, fees  
8 and other property constituting proceeds obtained as a result of those violations;  
9 and 3) all property used in any manner or part to commit or to facilitate the  
10 commission of those violations.

11 b) A sum of money equal to the total amount of money involved in each  
12 offense, or conspiracy to commit such offense, for which the defendant is  
13 convicted. If more than one defendant is convicted of an offense, the defendants  
14 so convicted are jointly and severally liable for the amount involved in such  
15 offense; and,

16 c) Pursuant to Title 21, United States Code, Section 853(p), as  
17 incorporated by Title 18, United States Code, Section 982(b), each defendant shall  
18 forfeit substitute property, up to the value of the amount described in paragraphs a  
19 and b, if, by any act or omission of the defendant, the property described in  
20 paragraphs a and b, or any portion thereof, cannot be located upon the exercise of  
21 due diligence; has been transferred, sold to or deposited with a third party; has  
22 been placed beyond the jurisdiction of the court; has been substantially diminished  
23 in value; or has been commingled with other property which cannot be divided  
24 without difficulty. All in accordance with Fed. R. Crim. P. 32.2.

25 The property subject to forfeiture pursuant to Title 18, United States Code,  
26 Section 982 includes, but is not limited to, the following:  
27  
28

1                   REAL PROPERTY

2           All that lot or parcel of land, together with its buildings, appurtenances,  
3 improvements, fixtures, attachments and easements, located at 3127 East River  
4 Glen Drive, Colbert, Washington, (title to said real property is vested in Dixie E.  
5 Randock, as Trustee of the Children's Future Revocable Trust, a trust), and Parcel  
6 Number 37033.9138 located in Spokane County, Washington, (title to said real  
7 property is vested in Steven Randock and Dixie E. Randock, husband and wife),  
8 more particularly described as:

9                   3127 East River Glen Drive, Colbert, Washington:

10           That portion of the Southwest Quarter of Section 3,  
11 Township 27 North, Range 43 East, W.M. described as  
12 follows:

13           Beginning at the Southwest Corner of Section 3; thence  
14 North 00°04'10" East 73 feet to the True Point of  
15 Beginning; thence continuing North 00°04'10" East 587  
16 feet along the section line; thence South 89°52'45" East  
17 1,422.87 feet; thence South 00°04'10" West 22.81 feet to  
18 the centerline of the Little Spokane River; thence South  
19 79°12' West 140 feet; thence South 50°50' West 530  
20 feet; thence South 18°54'06" West 181.74 feet; thence  
21 South 00°26'24" West 30 feet; thence North 89°52'45"  
22 West 816.01 feet to the True Point of Beginning; Except  
23 County Rd;  
24 Also Except the West 400 Feet Thereof.

25           Together with all appurtenances, fixtures, attachments,  
26 and improvements thereto and thereupon.

27           SUBJECT to any easements, rights of way, reservations  
28 and/or exceptions of record.

1                   Parcel Number 37033.9138, located in Spokane County,  
2                   Washington:

3           The West 440 feet of that portion of the Southwest  
4 Quarter of Section 3; Township 27 North, Range 43  
5 East, W.M., described as follows;

6           Beginning at the Southwest Corner of Section 3; thence  
7 North 00°04'10" East 73 feet to the True Point of  
8 Beginning; thence continuing North 00°04'10" East 587  
9 feet along the section line; thence South 89°52'45" East  
10 1,422.87 feet; thence South 00°04'10" West 22.81 feet to  
11 the centerline of the Little Spokane River; thence South  
12 79°12' West 140 feet; thence South 50°50' West 530  
13 feet; thence South 18°54'06" West 181.74 feet; thence  
14 South 00°26'24" West 30 feet; thence North 89°52'45"  
15 West 816.01 feet to the True Point of Beginning; Except  
16 County Rd;



1 Together with all appurtenances, fixtures, attachments,  
2 and improvements thereto and thereupon.

3 SUBJECT to any easements, rights of way, reservations  
4 and/or exceptions of record.

5 CURRENCY

6 \$10,320.00 United States currency seized on or about  
7 August 11, 2005, from Steven Randock and Dixie  
8 Randock.

9 CONVEYANCE

10 2001 Jaguar XK8, VIN: SAJDA42CX1NA13599.

11 SAFE DEPOSIT BOX

12 \$43,600.00 United States currency discovered and seized  
13 on or about August 11, 2005, from safe deposit box  
14 #155, located at American West Bank, rented by  
15 Lawrence ("Larry") Randock and/or Steven K. Randock,  
16 Sr.

17 FUNDS SEIZED FROM BANK ACCOUNTS

18 1) Funds in the amount of \$2,042.54 United States  
19 currency, held in the name of AEIT, Inc., and/or Steven  
20 Randock and Dixie Randock, seized from Wells Fargo  
21 Bank Account Number XXX-XXX2052 on or about  
22 August 11, 2005; and,

23 2) Funds in the amount of \$555.43 United States  
24 currency, held in the name of AEIT and/or Steven  
25 Randock and Dixie Randock, seized from Bank of  
26 Fairfield Account Number XXXX8759 on or about  
27 August 11, 2005.

28 BANK ACCOUNT(S)

1) \$280,000.00 United States funds or other  
monetary instruments credited to Banc Caribe Account  
Number CK-XX0941, held in the name of Saint Regise  
University (AEIT Peer Degree Program) Graduate  
School, and/or Steven Randock and Dixie Randock;

2) \$150,000.00 United States funds or other  
monetary instruments credited to Banc Caribe Account  
Number SV-XX0084, held in the name of Saint Regise  
University (AEIT Peer Degree Program) Graduate  
School, and/or Steven Randock and Dixie Randock; and,

3) \$50,000.00 United States funds or other monetary

instruments credited to Loyal Bank, Limited Account  
Number XXXXXXXXX2405, held in the names of Steven  
K Randock and Dixie Randock.

All pursuant to Title 18, United States Code, Section 982(a)(1).

DATED this 4 day of October, 2005.

A TRUE BILL

Foreperson

*Thomas O. Rice*  
Criminal Chief  
for James A. McDevitt  
United States Attorney

*George J.C. Jacobs, III*  
George J.C. Jacobs, III  
Assistant United States Attorney